FTC MOTION FOR TEMPORARY RESTRAINING ORDER EXHIBIT 7

Declaration of Edene Shirley Lakpa

DECLARATION OF EDENE SHIRLEY LAKPA PURSUANT TO 28 U.S.C. § 1746

- I, Edene Shirley Lakpa, have personal knowledge of the facts below and am competent to testify about them:
 - 1. I am over 18 years old.
 - 2. I am a resident of Rockville, Maryland.
 - 3. I am currently employed as a legal assistant at a law firm.
- 4. In or around November 2018, I was scrolling through Instagram when I came across an Instagram story from a friend I'd gone to college with. My friend, who was pretty well known at my college and had a lot of Instagram followers, was advertising a credit repair opportunity. About a month later, in or around December 2018, I came across another Instagram story from another person I'd gone to college with. She was advertising the same credit repair opportunity that my friend had been advertising a month prior. I knew it was the same opportunity because both stories featured a screenshot of an email from a credit repair service named "Smart Credit." This email stated that the recipient's "credit score increased by [X amount of] points." I believe the second person's post cited "100 points." Both posts also mentioned a man named "Kevin." Soon after that, I saw my friend reposting a screenshot of the second person's Instagram story on their own story, which confirmed for me that the two had been posting about the same opportunity.
- 5. These Instagram stories caught my attention, as I had actually been interested in getting my credit repaired. I had graduated from college earlier in 2018, and made some financial decisions my freshman year that harmed my credit.
- 6. In or around January 2019, I reached back out to the friend whose story I'd seen in November 2018 and told him I was interested in the credit repair opportunity. His advertisement post had said to "DM" him, so I sent him an Instagram direct message ("DM") requesting more information. My friend

subsequently connected me with the aforementioned man, Kevin Jerome. My friend provided me with Jerome's phone number, and I introduced myself to him via text message. We then set up a calendar appointment so that Jerome could provide me with more information about the credit repair opportunity over the phone. A true and accurate copy of the initial text conversation I had with Jerome is attached as **Attachment A**.

- 7. During our first call, Jerome explained that he was an agent for Financial Education Services ("FES"), and that this credit repair opportunity would remove all negative marks and late payments from my credit report. He told me success stories about clients of his that got entire bankruptcies removed from their reports using FES's services. He explained that FES would accomplish all this through a dispute process that "the credit bureaus don't want you to know about." He explained that FES had lawyers on hand that would help consumers throughout the credit repair process. However, he did not specify or explain how the lawyers would actually go about repairing credit, despite me asking for further clarification. He simply gave me a rambling answer about how they were going to write letters that were in compliance with the law. I later understood that the letters to which Jerome referred to were dispute letters that FES would draft on my behalf disputing items on my credit report. I would then sign these letters and send them out directly to the credit bureaus.
- 8. Jerome mentioned that the opportunity would cost about \$89 a month. There was also an additional initial registration fee for the credit repair service that was somewhere around double the monthly \$89 fee. However, Jerome claimed he would waive the additional fee for me "since I was a Howard alum," and would only have me pay \$89 to get started.
- 9. I was admittedly a little skeptical about this service and Jerome's claim that all negative marks would be removed from my credit report. However, since I'd previously seen those two people I went to college with advertising this

opportunity in a positive light, one of whom was a friend I trusted and respected, I decided to trust Jerome and register for FES's credit repair service. I reached out to Jerome via text message on or around January 16, 2019, in order to inquire about next steps in the registration process.

- 10. We completed the whole registration process over the phone and through text. Jerome completed my registration paperwork for me, and I recall having to send him a copy of my driver's license, my social security card, and a utility bill. I never actually got to see any of the registration paperwork Jerome was filling out for me.
- 11. During this registration process, I asked Jerome if FES could send me a starting letter or some similar type of written document to confirm my registration with the credit repair service and provide the details of the service. Jerome explained that FES "doesn't do contracts," which I thought was strange. Unfortunately, I never received a contract or starting letter from FES. Furthermore, I never received a written statement called the Consumer Credit File Rights Under State and Federal Law, and I also never received a contract cancellation form. I did not sign any form during the registration process. A true and accurate copy of text messages in which I inquired about both a starting letter and next steps in the registration process is attached as **Attachment B**.
- 12. After Jerome completed my registration, Jerome sent me the username and password I would use to log in to my online credit repair account, which was under a website portal named United Credit Education Services ("UCES"). The name of the credit repair service I'd purchased was FES Protection Plan, though I realized I'd also been registered for a credit monitoring and identity protection plan called Smart Credit, which is a name I recognized from the stories I'd seen on Instagram. The UCES portal was where I'd be accessing my dispute letters, whereas the Smart Credit portal would be a place I could upload my financial documents, including bills and loans I owed. I would also be able to create a will on the Smart Credit

portal. After completing my FES registration, Jerome sent me a welcome text, as is noted in Attachment B. The closest thing I received to a starting letter was an email from FES thanking me for my enrollment with the FES Protection Plan, but it lacked any details about the substance of the service. A true and accurate copy of this email from FES is attached as **Attachment C**.

- 13. Although Jerome did not explain it clearly on our first call, I came to understand that the way FES would supposedly fix my credit was through a dispute letter process. Jerome claimed that FES had lawyers on hand who would write letters disputing various items on your credit report, including items that were actually supposed to be there. The letters featured UCES's watermark, as well as a P.O. Box address, email address, and phone number that were all supposedly affiliated with the brand. New letters were only available once every 30 days, and because they were made available to me in PDF form, I was unable to edit them (outside of providing my signature). Jerome claimed that the reason the dispute letter process worked is because eventually, the credit bureaus would stop responding to disputes on time, thus forcing them to remove the disputed accounts from one's credit report. He explained this information to me in better detail on a phone call we shared after I completed my registration.
- 14. Jerome explained that during my first few months with FES, these letters would be emailed to me, at which point I had to print them, purchase the envelopes and stamps, and mail them out to the credit bureaus myself. A true and accurate copy of an email I received from FES along with my dispute letters is attached as **Attachment D**. A true and accurate copy of the dispute letters themselves is attached as **Attachment E**. Moreover, I was instructed to track the letters after mailing them out and report to FES on when they'd been delivered. I also had to report to FES every time the credit bureaus responded back to me and send them the responses I'd received. A true and accurate copy of texts in which Jerome instructed me to submit response letters to FES is attached as **Attachment F**.

15. Upon reading through these letters, I noticed the letters were disputing items

- that were supposed to be on my credit report since they were my accounts. Jerome suggested he could adjust the language for accuracy. The next day, Jerome called me to discuss how exactly I wanted to change the language. However, a little under three weeks later, Jerome texted me and informed me that the "credit litigation team" had informed him that the dispute letters' language could *not* be adjusted. I would need to send the letters in the exact manner they were written. A true and accurate copy of a text conversation I shared with Jerome in which the aforementioned issue was discussed is attached as **Attachment G**.
- 16. This whole process made me very skeptical about FES. I began to wonder why I was charged \$89 a month for a service in which I had to complete a significant amount of work myself, and why the lawyers did not send these letters to the credit bureaus themselves. I eventually learned that the templates for the letters were actually already uploaded to my portal, so there had been no need for me to wait around for them to be emailed over.
- 17. Another thing I did not understand about FES was that they required me to pay the monthly \$89 fees even during months where FES did no work for me. The credit bureaus would take about 4-6 weeks to respond to dispute letters, which meant there would be entire months when FES's lawyers did nothing for me. I did not feel comfortable paying the service fees during these long waiting periods.
- 18. Some time in late 2016 or in 2017, I'd discovered some fraudulent phone plan accounts listed on my credit report that appeared to claim that I was overdue thousands of dollars on phone lines that I personally did not own.
- 19. I told Jerome that I wanted ask FES's lawyers to help me get these accounts removed from my report. Jerome had me submit some communication form on the UCES portal, which is the same portal where I accessed my dispute letters. The form had me fill out my name and then explain what I wanted to ask the lawyers about. A customer service representative for the lawyers subsequently responded to

my inquiry via email. She explained that the lawyers claimed they could not use dispute letters to remove these phone acconts from my credit report. Instead, the lawyers recommended I file a police report and dispute these accounts directly with the phone companies the accounts were associated with. This made no sense to me. These fraudulent accounts were bringing down my credit score—wasn't the entire point of the dispute letters to dispute negative charges, marks, and accounts on our credit reports? Why were the lawyers using dispute letters to dispute items that were supposed to appear on my credit report, yet unable to dispute items that were not supposed to be there?

- 20. Throughout my time with FES, Jerome regularly tried to recruit me to become an FES agent as well. He would ask me at least once a month. He claimed that if you recruited a couple of new FES consumers on a monthly basis, you would qualify to receive your own credit repair services for free. He also said that agents who recruited a significant number of people to the company would become eligible for jobs at FES's corporate office. However, I was not interested. If I was having bad personal experiences with this credit repair service, why would I want to advertise and sell for them? Jerome also asked me if any of my friends or family would be interested in the credit repair services, but I did not feel comfortable recommending them. See February 18, 2019 text conversation in Attachment G.
- 21. On or around April 2019, I reached out to Jerome to express my grievances about both him and FES as a whole. I felt that there was a major lack of transparency regarding the manner in which FES was "repairing" my credit. For example, I sent the responses from the credit bureaus to FES according to their instructions, but no one from FES ever followed up with me or explained what next steps FES would take. Whenever I asked Jerome to elaborate on the process, he would either ignore me or give me run-around answers. I was also frustrated by the long wait-times in between rounds of letters, and felt that nothing was truly being done to improve my overall credit.

- 22. Unfortunately, my displeasures with both Jerome's and FES's services only grew from there. At one point, Jerome countered my complaints by stating that FES *had* in fact removed one singular account from my credit report: my Discover account. Even though I accepted Jerome's claim at the time, I ended up finding out it was not true. The next time I checked my credit report, I learned that my Discover account was still present on the report. A true and accurate copy of the texts Jerome sent me confirming this account removal from my credit report is attached as **Attachment H**.
- 23. On or around May 30, 2019, I reached out to FES corporate via email and requested that they close my account for good. I was offered a free month of credit repair services in an attempt to convince me to continue giving FES a chance. I ended up agreeing to this free month. A true and accurate copy of an email I received from FES corporate confirming their free month offer is attached as **Attachment I**.
- 24. I decided to finally terminate the credit repair services when I did some online research and realized that FES was likely running an illegal credit repair operation. Additionally, no changes were made to my credit after this free month I was offered. Once I decided to leave FES for good, I attempted talking to Jerome about the matter first. However, Jerome and his assistant, Kayla, were not helpful or cooperative. I then reached out to FES corporate via email and requested that they close my account for good. On or around June 28, 2019, FES officially cancelled my credit repair service account.
- 25. I regularly monitored my credit report while registered for FES's credit repair services, and found that no changes were made to my credit, including the Discover account that Jerome had falsely claimed was removed. The credit bureaus frequently sent me letters stating that they'd reviewed the items my letters had disputed, and were able to confirm that the items in question did in fact belong on my credit report. When Jerome first told me about the attorneys before I'd

registered with FES, I was under the impression that these attorneys would talk to the credit bureaus directly and negotiate my credit report with them. However, this was clearly not the case. To be quite honest, I'm not even sure these attorneys exist, as I never got to speak with them directly. The closest I ever got to speaking with the FES "attorneys" was via their customer service representative when I had asked for their help removing the fraudulent phone accounts from my credit report.

26. After cancelling my FES registration, I filed a complaint with the Better

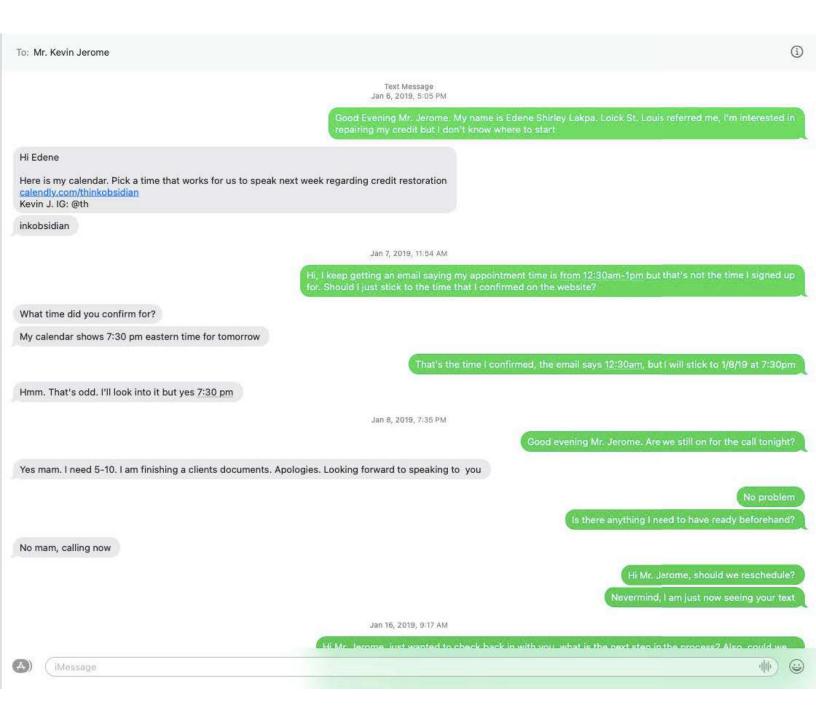
Business Bureau ("BBB") in hopes they would help me obtain a full refund of everything I paid to FES since no changes had been made to my credit score. I was registered with FES for a total of six months from January to June 2019, but since I'd received one free month of service in June, I was only billed the monthly \$89 fee for a total of five months. A true and accurate copy of excerpts of my bank statements showing payments to UCES from January until early June of 2019 is attached as Attachment J. The total amount I requested back was \$455. FES replied to my BBB complaint claiming they could not refund me since they never guaranteed any results from their credit repair service. This was a lie. Jerome had explicitly promised me negative items were going to be removed, which would in turn improve my credit score. This obviously did not occur. Thankfully, FES eventually issued me a \$455 refund check. A true and accurate copy of this refund check is attached as Attachment K.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

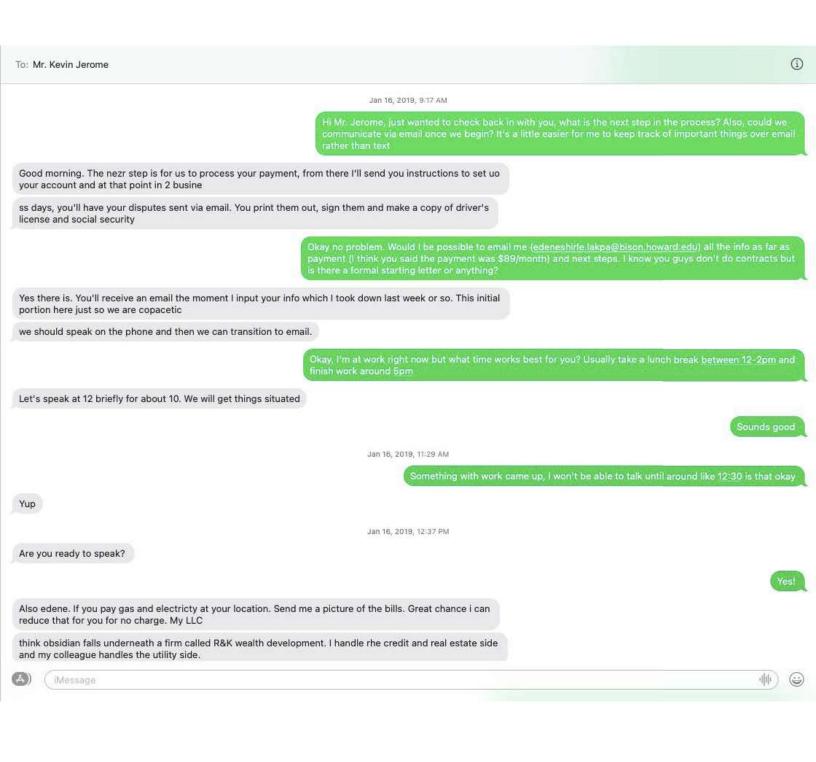
Executed in Rockville, Maryland on Jeptember 17th, 2021

Edene Shirley Lakpa

ATTACHMENT A



ATTACHMENT B



To: Mr. Kevin Jerome

(i)

think obsidian falls underneath a firm called R&K wealth development. I handle rhe credit and real estate side and my colleague handles the utility side.

I do but I split it with my roommates. But my name is only on one bill

Send the one that has your name and I'll see how much if possible the bill can be reduced.

Okay, I can send it later when I get of

Great

Edene congratulations on starting your Credit Restoration Services:

Steps to activate Services:

Log in to Protection Plan by using the email address as the username and password is last 4 of SSN.

Follow steps to verify identification and address,

- Next activate Credit Restoration by clicking on it. Choose "Pull Credit Report Now" and watch the 60 Second video that explains the document process. Once it says "you have successfully activated Credit Restoration" wait for your dispute letters to arrive via mail in 7 days (if you like, we can request them via email and then you can print them out)
- Next activate Credit Monitoring by selecting it on the Dashboard, select "Create an account" pick a password and answer security questions. Leave sponsor code blank. It will charge your card \$1 to verify your identity. Say no to any other offers for \$9.99. (Your Membership is already paid for thru FES) log in to Smartcredit and view your entire credit report, inquires, your Credit score, your Car Insurance Score, your Car Credit Score, your Employment scores. And activate SmartPhone alerts . It will now alert you to changes on your credit report and your credit score increases.
- Next activate Identity Theft Protection.

The other 10 services you should also activate. But at least activate these 3 for now. Text me or call me with any questions or customer service is open 9am-9pm to help you. CONGRATS 🔖 🎉 🔭

Jan 18, 2019, 11:10 AM

Hey edene, did you set up your account?

No I've been slammed with work but I'll make sure to get to it this weeken

Roger that

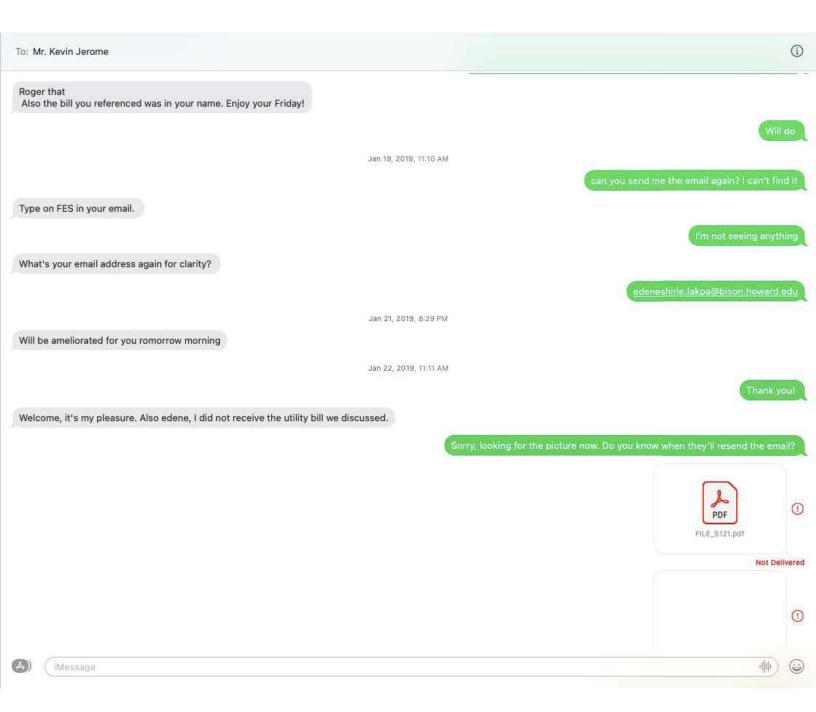
Also the bill you referenced was in your name. Enjoy your Friday!



iMessage.







ATTACHMENT C

From: Kayla Plummer kay ap@myfes.net
Subject: FES
Date: January 22, 2019 at 11:37 AM
To:



Dear FES Customer,

Thank you for your enrollment and welcome to the FES Protection Plan! In order to begin your credit restoration you need to login to www.fesprotectionplan.com to complete the following, 3-step activation process.

Please note: In order to begin your credit restoration process, your credit restoration must be activated by obtaining your credit report.

To do so:

- 1. Log in to your FES Protection Plan account at www.fesprotectionplan.com
- 2. Click on "Credit Restoration" and securely verify your personal information
- 3. Watch the short, 60 second video explaining the dispute process www.uces.co/dispute
- 4. Read how your credit report is pulled, and click the button to fully activate!

If you have any questions, please call.

Customer Support Phone: 248-848-9065 Option 1





Visit us at www.fesprotectionplan.com www.united-credit.org

ATTACHMENT D

From: nfo@fesprotect onp an.com
Subject: Your D spute Letters
Date: February 1, 2019 at 8:09 AM



Dear Customer,

Attached are your dispute letters to sign and mail to the credit bureaus. Please complete the following quick steps to ensure the best results:

- 1) Pr nt out your d spute etters from the attached .pdf fi e. You shou d have three etters, one for each cred t bureau Equ fax, Transun on, and Exper an.
- 2) S gn each of the three etters, remove the b ank sheet of paper w th n each set of etters and rep ace t w th a copy of your soc a secur ty and address ver ficat on.
- 3) Ma out your etters, with attached verification documents, to each credit bureau according to the address on the top of each dispute etter.
- 4) Watch for your updated credit reports to arrive in approximate y 30-45 days. Upon receipt, please forward to us so that we may update your account.
- 5) If you have any quest ons, p ease contact our Customer Support Team at (248) 848-9065, opt on 1 for ass stance.

For your protect on these d spute etters are password protected and can be opened by enter ng the ast four d g ts of your Soc a Secur ty Number n the password fie d.

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Regards, Customer Support / FES Protect on P an Phone: 248-848-9065, opt on 1 Fax: 248-699-7000

Ema: customersupport@fesprotect onp an.com
V s t your account on ne at www.fesprotect onp an.com

This emain and any files transmitted with it are confident a land intended solely for the use of the individual orientity to whom they are addressed. If you have received this emain error please delete it. This message contains confident a information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please not fy the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are not field that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.



Edene_418029_ 1dispute.pdf

ATTACHMENT E





United Credit Education Services

Edene S Lakpa



2/25/2019

Dear Edene Lakpa:

Thank you for selecting United Credit Education Services to help you remove inaccurate, obsolete, and unverifiable items off your credit report. - we are excited to partner with you!

Enclosed you will find dispute letters that include all derogatory accounts that are reporting on your credit file. To get started, please complete these three easy steps:

Step 1 - Review your dispute letters.

Carefully review each account for accuracy and to confirm that you would like it disputed with Experian, Equifax and TransUnion. If there are any accounts that you would like removed from the dispute letters, or if you have any additions or changes that need to be made, contact United Credit Education Services and we will create new dispute letters for you.

Step 2 - Mail your letters to the credit agencies.

If you are satisfied with the enclosed letters, sign and attach your address and social security identification as shown on the enclosed instructions. (FOR YOUR SECURITY AND PROTECTION, THE CREDIT BUREAUS WILL NOT RESPOND TO YOUR LETTERS WITHOUT THE PROPER IDENTIFICATION DOCUMENTS ATTACHED).

Step 3 - Watch for your updated credit reports from Experian, Equifax and TransUnion.

Please make a notation on your calendar of the date you sent the dispute letters to the agencies. You should receive an updated credit report from each agency within 30-45 days. Make a copy of each credit report received for your records and send the original to us. We will update your accounts in preparation for your next set of letters.

United Credit Education Services Contact Information

PO Box 130 Farmington, MI 48332

Phone: (248) 848-9065 Fax: (248) 699-7000 Email: reports@united-credit.org 02/25/2019

Experian P. O. Box 9701 Allen, TX 75013

To Whom It May Concern:

I have thoroughly reviewed my credit report and I would like to inform you of the inaccuracies it contains (see list below). I am requesting, under the provisions of the Fair Credit Reporting Act (FCRA), 15 USC section 1681i, that you investigate these accounts.

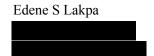
Accounts	Reason
	This collection is not my account.
	This collection is not my account.
	Not mine, I never had an account with this company.
	Not mine, I never had an account with this company.

I understand that failure to investigate these accounts within a period of thirty days will result in "non-verification" which requires that the above accounts be immediately removed from my credit file.

I also understand that the Fair Credit Reporting Act – specifically 15 USC sections 1681i(d) and 1681j – requires that I receive both written notification of the appropriate corrections and updated credit reports at no charge.

Thank you for your time and attention to this matter. I look forward to hearing from you soon.

Sincerely,



02/25/2019

Equifax P. O. Box 740241 Atlanta, GA 30374

To Whom It May Concern:

I have thoroughly reviewed my credit report and I would like to inform you of the inaccuracies it contains (see list below). I am requesting, under the provisions of the Fair Credit Reporting Act (FCRA), 15 USC section 1681i, that you investigate these accounts.

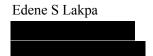
Accounts	Reason
	This collection is not my account.
	This collection is not my account.
	Not mine, I never had an account with this company.
	Not mine, I never had an account with this company.

I understand that failure to investigate these accounts within a period of thirty days will result in "non-verification" which requires that the above accounts be immediately removed from my credit file.

I also understand that the Fair Credit Reporting Act – specifically 15 USC sections 1681i(d) and 1681j – requires that I receive both written notification of the appropriate corrections and updated credit reports at no charge.

Thank you for your time and attention to this matter. I look forward to hearing from you soon.

Sincerely,



02/25/2019

Transunion P. O. Box 2000 Chester, PA 19016

To Whom It May Concern:

I have thoroughly reviewed my credit report and I would like to inform you of the inaccuracies it contains (see list below). I am requesting, under the provisions of the Fair Credit Reporting Act (FCRA), 15 USC section 1681i, that you investigate these accounts.

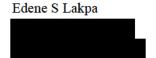
Accounts	Reason
	This collection is not my account.
	Not mine, I never had an account with this company.
	Not mine, I never had an account with this company.
	Not mine I norm had an account with this account
	Not mine, I never had an account with this company.

I understand that failure to investigate these accounts within a period of thirty days will result in "non-verification" which requires that the above accounts be immediately removed from my credit file.

I also understand that the Fair Credit Reporting Act – specifically 15 USC sections 1681i(d) and 1681j – requires that I receive both written notification of the appropriate corrections and updated credit reports at no charge.

Thank you for your time and attention to this matter. I look forward to hearing from you soon.

Sincerely,



ATTACHMENT F

To: Mr. Kevin Jerome



Jan 23, 2019, 10:55 AM

Please be aware that we will be preparing and sending your next set of disputes letters in the near future.

It is important that you remember to send any credit reports or correspondence you receive from Experian, Equitax or TransUnion to Positive Credit Builder at the following address. Be sure to keep a copy for your records.

Positive Credit Builder PO Box 417 Farmington, Mt 48332

For document clarity and completeness, FES prefers to receive your credit reports by mail. If you email your reports, they should be scanned and directed to specific-ellonplan.com. Caution: email is not as reliable mailting your credit reports - FES cannot be responsible for missing pages, incomplete credit reports or documents that are not received by our email directory. All credit reports must be emailed as one multi page pdf document, emails sent with multiple individual pages will not be processed.

These documents from the credit bureaus will be used to update your file and prepare your next set of dispute letters. If you did not receive any updates from Experian, Equifax or TransUnion, your dispute letters will still be prepared and sent to you.

Get an instant account update and progress report anytime by visiting www.fesprotectionplan.com.

Need additional coaching assistance? Contact an FES Protection Plan Coach at 248-848-9065, option 1 or support@fesprotectionplan.com.

Thank you,

Please send all letters and mail regarding your disputes to this email.

Send them that so they know what to do with the results. They only have 2 weeks to get them into corporate before the next round of letters are created

Jan 24, 2019, 2:04 PM

Helio, sorry it took so long but I started setting up my account. I'm confused as to how to set up the identity protection. Is that through Privacy Armor? and if so it says I need a log in or member ID?

You may need to contact privacy armor. That's a privacy armor question. Yes it is the identity theft protection

You may have an email from from privacy armorb

You should have an email indicating privacy armor will notify you when your account is ready

If you are still confused reach out to me and i will walk you through

Sry. I signed up while I was on my lunch. I'll finish the process tonight and wait for the email from privacy armo

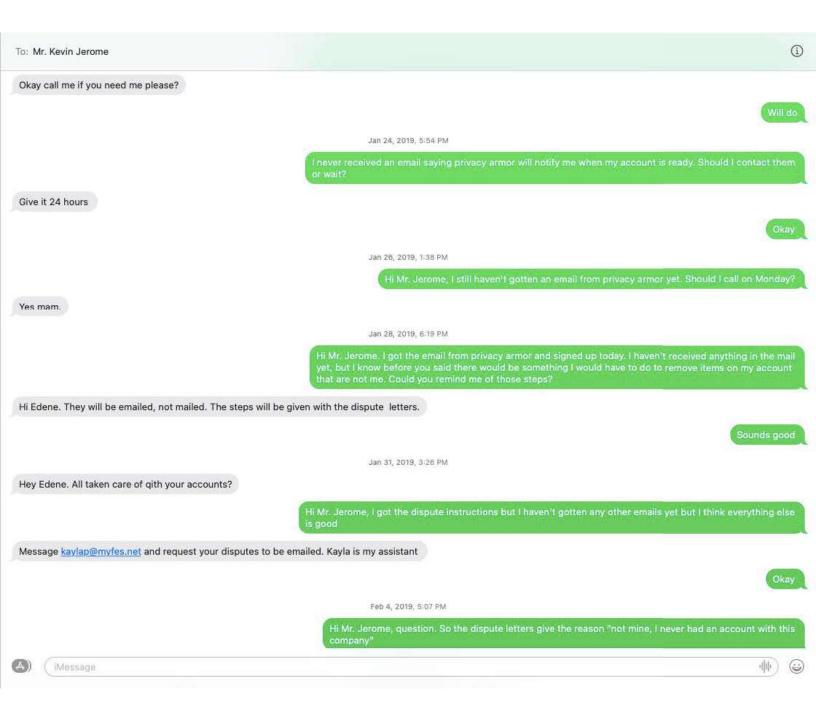
Okay call me if you need me please?



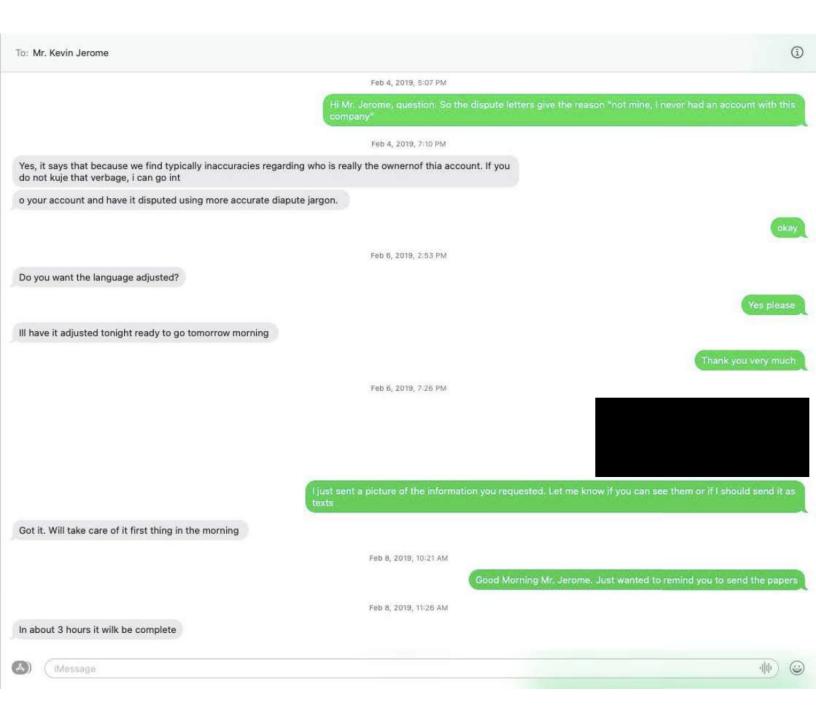
iMessage

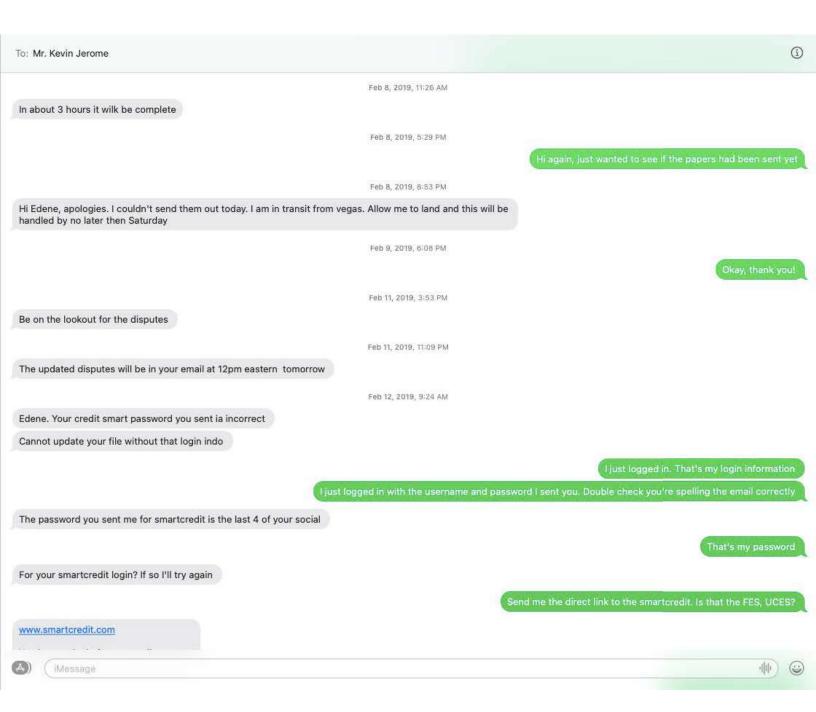


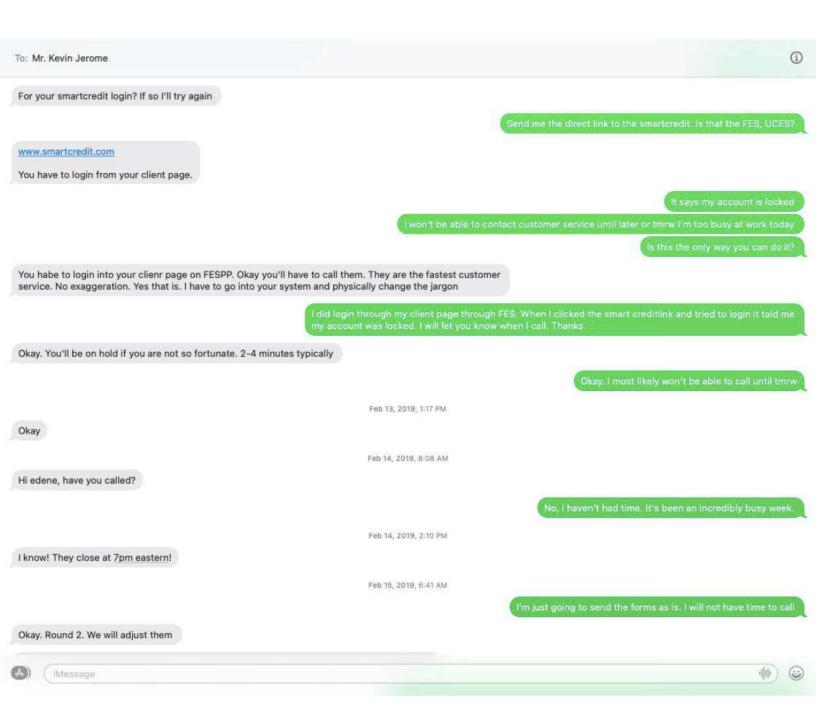


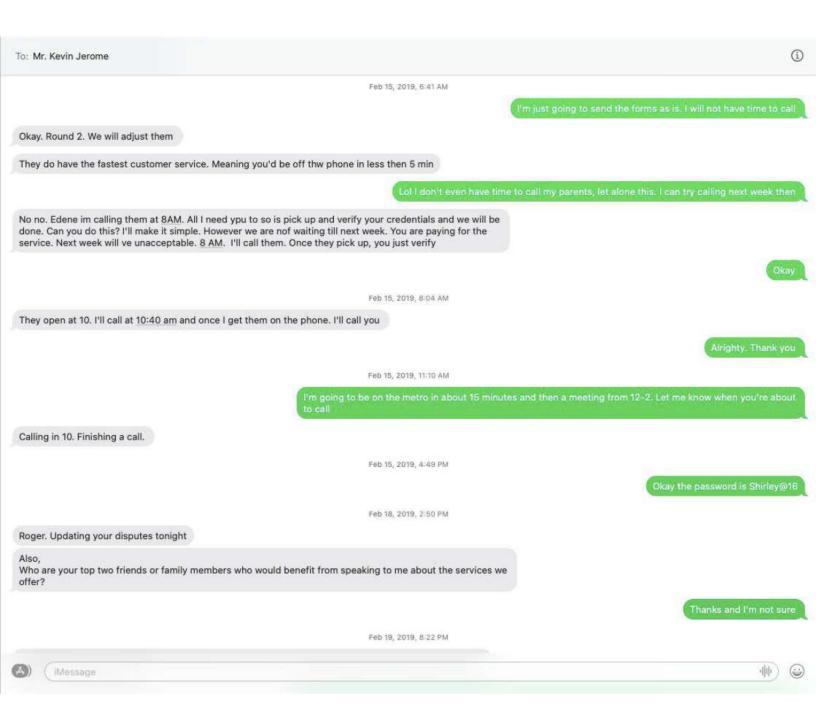


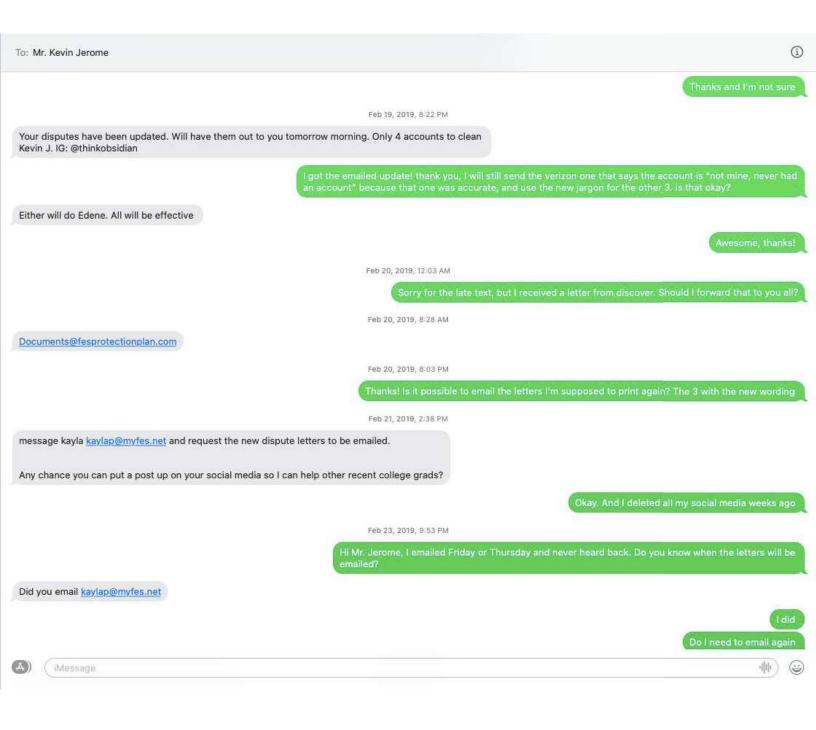
ATTACHMENT G

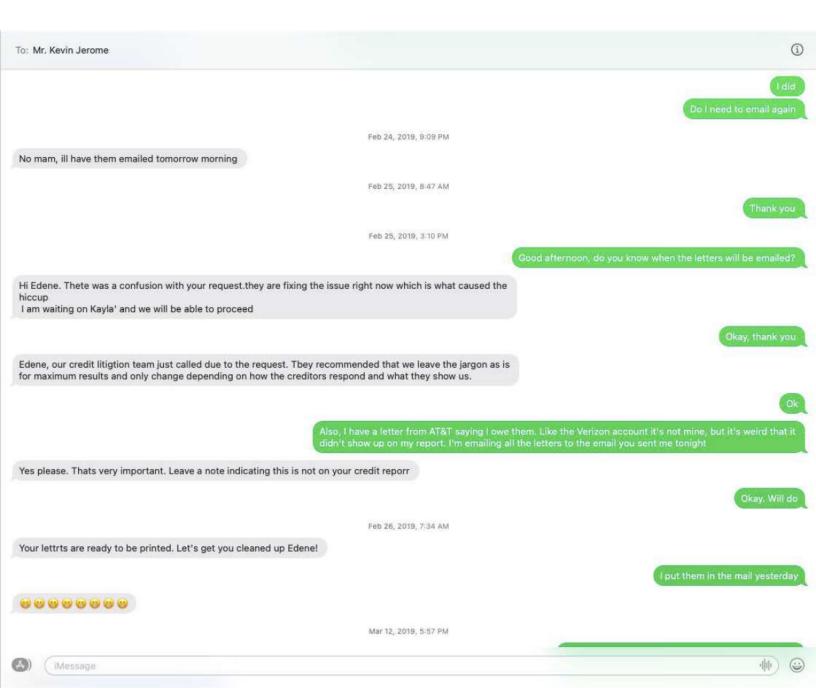












ATTACHMENT H

To: Mr. Kevin Jerome

1

Apr 12, 2019, 7:38 PM

Hi Edene. For concerns about questions about proper emails to send documents to

It is documents@fesprotectionplan.com

If you do not feel as if things aren't cha ging or they aren't responding. The corporate number is

±1 248-848-9065. As for reaching me. You have my calendar now to awt appointments. Wheb i first began disputing my cases for 5 months I was able to get two things off my report. I was somewhat upset as other cliwnta went up like 100 points in two months and then BAM, things began coming off. For more explanation if still frustrated. Call corporate and they can go into more detail as to the unknown account that is showing up.

Apr 17, 2019, 4:50 PM

Just got off a frustrating call with someone in corporate customer service. I am still thoroughly confused as to this whole process. I scheduled a call with you turn. I would like to discuss my settlement with discover, discovers response that they would not remove negative items from my account and whether or not any of the other companies I have negative items with have similar policies (that they do not remove negative items from credit reports). Additionally, I would like to discuss what the importance and use of dispute letters are. Thank you.

Yes ma'am

Apr 18, 2019, 6:38 PM

Hi sry about that I'm ready now

Apr 26, 2019, 12:50 PM

Edene, im reading your investigatio. Results. The service is working..... They deleted the discover account from your report!

Kevin J. IG: @thinkobsidian

Oh okay, nice!

May 3, 2019, 4:54 PM

I am going to go to a police station this weekend, what are the next steps with the other accounts. I haven't received any other letters or anything

May 6, 2019, 1:54 PM

Hi Edene, This is the process, if you look at your investigation trsults, items are being removed. I saw every on this on the last set of results you sent to me.

I did take a look online, it only shows that the discover account has been deleted from experian. Do you know if



Message





To: Mr. Kevin Jerome



May 6, 2019, 1:54 PM

Hi Edene, This is the process, if you look at your investigation trsults, items are being removed. I saw every on this on the last set of results you sent to me.

I did take a look online, it only shows that the discover account has been deleted from experian. Do you know if it is taken off of all three or just one?

Yes all three. Remember this is a legal dispute profess. We can't rush the attorneys in how they arr disputing your info. The fact that we removed one accoubt on your last dispute is indication we are getting results. Outside of that we have to mail the process and rinse and repeat the process until everything is off

Also, I know you previously said there was a way to add my rent payments to my credit. Should I still do this if one of my roommates pays rent late? the way it goes on the account even though we all pay sparely it's counted under one account. Additionally, you had previously said something about utility bills being used to decrease the amount of something but I can't remember whay

All of your messages are jumbled

Also, I know you previously said there was a way to add my rent payments to my credit. Should I still do this if one of my roommates pays rent late? the way it goes on the account even though we all pay sparely it's counted under one account. Additionally, you had previously said something about utility bills being used to decrease the amount of something but I can't remember whay

May 6, 2019, 5:34 PM

I'm not sure why it sent as multiple messages I only sent on text. But I took a picture of the text, did you get the picture?

May 8, 2019, 11:51 AM

Hi edene. No ma'am. You were asking about credit my rent correct?

Yes. But one of my roommates pays late, although our names are all attached to our individual payments the lease counts us all as one



Message





ATTACHMENT I

From: Shirley Lakpa

Subject: Re: UCES - fo ow up
Date: June 4, 2019 at 9:55 AM
To: Jade Teat jadet@myfes.net



Good Morn ng Jade,

Thank you so much for a your he p. I d d get your vo cema s (sorry my phone s typ ca y on DND dur ng the dayt me wh e I'm at work). You have been very he pfu . I was ab e to og nto my account and ook at the documents. I w spend t me gett ng more fam ar w th the process and ook ng at the documents as we as fam ar z ng myse f more w th the webs te. I w be sure to reach out f I have any quest ons.

Thank you aga n for your ass stance.

Regards,

Edene Shrey Lakpa

On Jun 4, 2019, at 9:49 AM, Jade Teat < jadet@myfes.net> wrote:

Good Morning Ms. Lakpa:

The scope of this question is a little too detailed to explain in email. However, I was able to leave you an voice mail. We have your updated email on file with the password being the last four of your social security.

Per our previous conversation, one free month will be applied to you account. Please reply to this email or call if you have additional concerns on this topic.

Sincerely,

Jade P L /Customer Support

United Credit Education Services

Fax: (248) 699-7000

Email: reports@myuces.net

From: Shirley Lakpa

Sent: Monday, June 3, 2019 7:07 PM **To:** Jade Teat <<u>jadet@myfes.net</u>> **Subject:** Re: UCES - follow up

Hi Jade.

Thank you so much for you call last week. Sorry we couldn't connect, when you called I was at work. There was something else I would like help with. I want to know if it is possible to remove Kevin Jerome and his assistant Kayla P from my account. They have not been very helpful. If it's possible I would like to work with someone else. If not possible, I would be fine just emailing the documents to FES and handling the dispute letter process using the online system.

I am also having trouble logging in. I updated my email last week on Friday from to and I'm having trouble logging in now. It's telling me that my login is incorrect. I did try the password reset option but I haven't received a reset link in any mailbox.

Best Regards,

Edene Shirley

On May 31, 2019, at 9:05 AM, Shirley Lakpa

wrote:

Thank you. Yesterday I was in a bad cell area and the phone kept cutting in and out. I will go online and visit the sections you suggested.

Regards,

Edene Shirley Lakpa Bachelor of Science, Biology Howard University, Class of 2018

On May 30, 2019, at 5:35 PM, Jade Teat < <u>jadet@myfes.net</u>> wrote:

Hello Ms. Lakpa,

As a continuation to our interrupted conversation, I wanted to provide this information regarding any correspondence from the creditors. To learn more about collections letters and how to respond, please visit the "*Credit Builder*" section on the Protection Plan website, and select the "*Forms & Documents*" tab.

Thank you,

Customer Support Team

Phone: (248)-848-9065, Option 1

Hours of operation: M-F 9am-9pm EST

Visit us at -

www.ucesprotectionplan.com

Sincerely,

Jade P L / Customer Support

United Credit Educational Services

Fax: (248) 699-7000

From: Jade Teat jadet@myfes.net Subject: RE: UCES - fo ow up Date: June 4, 2019 at 9:49 AM

JT

To: Shrey Lakpa

Good Morning Ms. Lakpa:

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Subject: Re: UCES - fo ow up
Date: June 3, 2019 at 7:06 PM
To: Jade Teat jadet@myfes.net



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Sincerely, Jade P L / Customer Support United Credit Educational Services Fax: (248) 699-7000

Email: reports@myuces.net

ATTACHMENT J

Case 2:22-cv-11120-BAF-APP ECF No. 5-7, PageID.383 Filed 05/23/22 Page 52 of 64

Wells Fargo Everyday Checking

Account number: ■ January 15, 2019 - February 13, 2019 ■ Page 1 of 5



EDENE	SHIRLEY	LAKPA

Questions?

Available by phone 24 hours a day, 7 days a week: Telecommunications Relay Services calls accepted

1-800-TO-WELLS (1-800-869-3557)

TTY: 1-800-877-4833

En español: 1-877-727-2932

華語 1-800-288-2288 *(6 am to 7 pm PT, M-F)*

Online: wellsfargo.com

Write: Wells Fargo Bank, N.A. (300)

P.O. Box 6995

Portland, OR 97228-6995

You and Wells Fargo

Thank you for being a loyal Wells Fargo customer. We value your trust in our company and look forward to continuing to serve you with your financial needs.

Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to wellsfargo.com or call the number above if you have questions or if you would like to add new services.

Online Banking

V Direct Deposit

V Auto Transfer/Payment

Online Statements

V Overdraft Protection

Mobile Banking

Debit Card

1

Activity summary

Beginning balance on 1/15
Deposits/Additions
Withdrawals/Subtractions
Ending balance on 2/13

Account number:

EDENE SHIRLEY LAKPA

Minnesota account terms and conditions apply

For Direct Deposit use

Routing Number (RTN): 091000019

Overdraft Protection

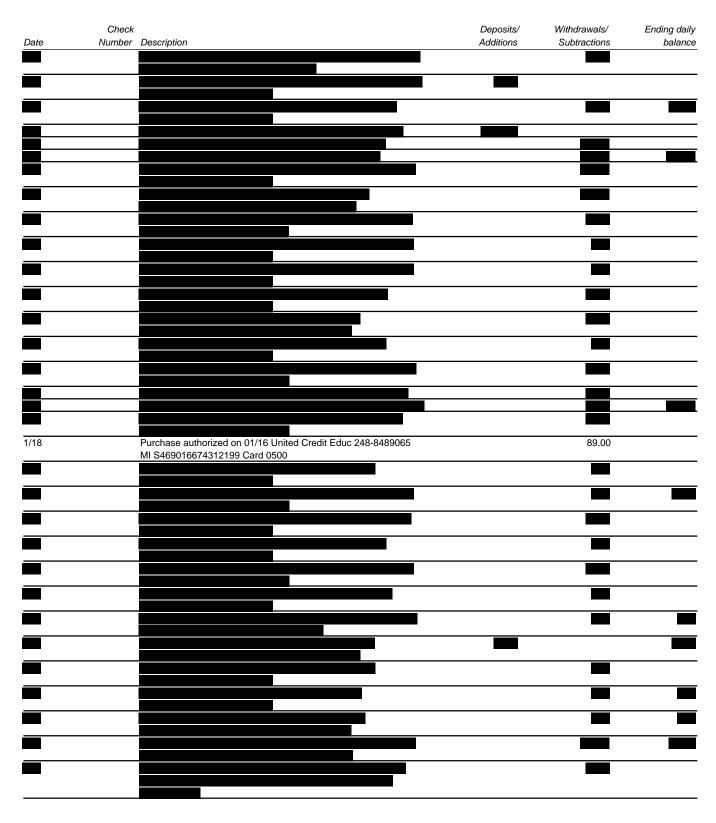
This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo store.

PX07 - 51

Account number: ■ January 15, 2019 - February 13, 2019 ■ Page 2 of 5



Transaction history



Case 2:22-cv-11120-BAF-APP ECF No. 5-7, PageID.385 Filed 05/23/22 Page 54 of 64

Wells Fargo Everyday Checking

Account number: ■ February 14, 2019 - March 13, 2019 ■ Page 1 of 8



EDENE SHIRLEY LAKPA	

Questions?

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Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to wellsfargo.com or call the number above if you have questions or if you would like to add new services.

Online Banking	✓	Direct Deposit	1
Online Bill Pay	1	Auto Transfer/Payment	
Online Statements	✓	Overdraft Protection	
Mobile Banking	✓	Debit Card	
My Spending Report		Overdraft Service	7

Activity summary

Beginning balance on 2/14
Deposits/Additions
Withdrawals/Subtractions

Withdrawals/Subtractions
Ending balance on 3/13

Account number:

EDENE SHIRLEY LAKPA

Minnesota account terms and conditions apply

For Direct Deposit use

Routing Number (RTN): 091000019

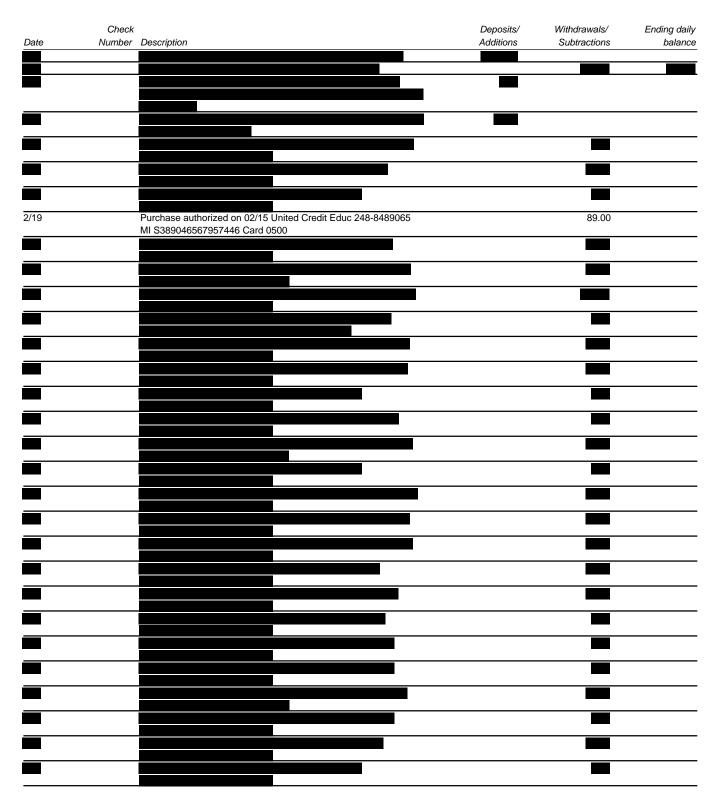
Overdraft Protection

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo store.

Account number: ■ February 14, 2019 - March 13, 2019 ■ Page 2 of 8



Transaction history



Case 2:22-cv-11120-BAF-APP ECF No. 5-7, PageID.387 Filed 05/23/22 Page 56 of 64

Wells Fargo Everyday Checking

Account number: ■ March 14, 2019 - April 11, 2019 ■ Page 1 of 8



EDENE SHIRLEY LAKPA	١

Questions?

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Account options

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Online Banking	✓	Direct Deposit	1
Online Bill Pay	1	Auto Transfer/Payment	
Online Statements	✓	Overdraft Protection	
Mobile Banking	✓	Debit Card	
My Spending Report		Overdraft Service	7

Activity summary

Beginning balance on 3/14
Deposits/Additions
Withdrawals/Subtractions

Ending balance on 4/11

Account number:

EDENE SHIRLEY LAKPA

Minnesota account terms and conditions apply

For Direct Deposit use

Routing Number (RTN): 091000019

Overdraft Protection

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo store.

Account number: ■ March 14, 2019 - April 11, 2019 ■ Page 2 of 8



Transaction history

Date	Check Number	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
3/20		Purchase authorized on 03/18 United Credit Educ 248-8489065 MI S309077615241390 Card 6791		89.00	

Case 2:22-cv-11120-BAF-APP ECF No. 5-7, PageID.389 Filed 05/23/22 Page 58 of 64

Wells Fargo Everyday Checking

Account number: ■ April 12, 2019 - May 13, 2019 ■ Page 1 of 7



EDENE	SHIRLEY	LAKPA

Questions?

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Account options

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Online Banking	✓	Direct Deposit	1
Online Bill Pay	1	Auto Transfer/Payment	
Online Statements	✓	Overdraft Protection	
Mobile Banking	✓	Debit Card	
My Spending Report		Overdraft Service	7

Activity summary

Beginning balance on 4/12
Deposits/Additions
Withdrawals/Subtractions
Ending balance on 5/13

Account number:

EDENE SHIRLEY LAKPA

Minnesota account terms and conditions apply

For Direct Deposit use

Routing Number (RTN): 091000019

Overdraft Protection

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo store.

Account number: ■ April 12, 2019 - May 13, 2019 ■ Page 2 of 7



Transaction history



Case 2:22-cv-11120-BAF-APP ECF No. 5-7, PageID.391 Filed 05/23/22 Page 60 of 64

Wells Fargo Everyday Checking

June 13, 2019 ■ Page 1 of 8



Questions?

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TTY: 1-800-877-4833

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Account options

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Online Banking	1	Direct Deposit	
Online Bill Pay	1	Auto Transfer/Payment	
Online Statements	✓	Overdraft Protection	
Mobile Banking	1	Debit Card	

Activity summary

Beginning balance on 5/14
Deposits/Additions
Withdrawals/Subtractions
Ending balance on 6/13



Account number:

EDENE SHIRLEY LAKPA

Minnesota account terms and conditions apply

For Direct Deposit use

Routing Number (RTN): 091000019

Overdraft Protection

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo store.



Date	Check Number	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending o
_					
_					
6/3		Purchase authorized on 05/30 United Credit Educ 248-8489065		89.00	
		MI S469150428084598 Card 6687			

ATTACHMENT K

YOUTH FINANCIAL LITERACY FOUNDATION 37735 ENTERPRISE COURT, SUITE 600B FARMINGTON HILLS, MI 48331	DATE 12/9/19 74-347/75
Four hundred fifty five dollars los	100 Only DOLLARS
FOR Refund	3 2 5 B 11



UCES Protection Plan

12/10/2019

Dear Edene Lakpa:

We are very sorry that you weren't satisfied with UCES Protection Plan. We strive to provide the best service possible to our clients and we are very disappointed that we did not meet your expectations.

Enclosed is a refund check for \$455.00.

Sincerely,

Customer Relations / UCES Protection Plan Phone: 248-848-9065, option 1 www.ucesprotectionplan.com



YOUTH FINANCIAL LITERACY FOUNDATION 37735 ENTERPRISE COURT, SUITE 600B	3673
FARMINGTON HILLS, MI 48331	DATE 12/9/19 74-347/724
Four hundred fifty true dollars los	18 45500 DOLLARS
FOR Refused	berald Robon
"00003673" ::072403473:	B 2 5 B II*